

Question 1:

Regarding Notice 8000.294, Check Airman Limitation, no standards are set as to the number of Training Center TCEs that may act as Check Airmen for an Operator. Some Principle Operations Inspectors have set a low number that limits the ability to schedule training.

Response:

There appear to be two separate issues raised by this question. The first concerns standards for the number of check airman that POIs will or may authorize for their particular operator and the second concerns scheduling of center personnel.

First Issue -

The policy divisions within the FAA do not believe it is in the public interest to provide formulas that determine or set arbitrary figures on the number of check airman the operator's POI may authorize. Current regulations require air operators to "...have sufficient qualified management and technical personnel to ensure the highest degree of safety in its operations." In this context Notice 8000.294 specifically did not limit the number of check airman that an operator may qualify and train in support of their operations. Additionally, Notice 8000.294 outlined in some detail the training required and for the first time acknowledged the training that a 142 center provides to their TCEs may be credited toward meeting the requirements of certain operating rules.

From a policy perspective we are not inclined to establish, nor in any artificial way limit, the POI's ability to manage a particular certificate holder's capability to comply with current regulations including the training, qualification, and continued surveillance of their authorized check airmen. We are, however, providing guidelines concerning the variable elements that should be considered when evaluating an operator's request for check airmen. For example:

- The kind of operation;
- The number and type of airplanes used;
- The area of operation;
- Crewing ratios and geographical distribution;
- Number and type of evaluations expected;
- How does the operator structure their evaluations;
- Crew turnover ratios;
- Projected initial, upgrade, and recurrent workload;
- Accessibility of appropriate training facilities;
- Calendar timing of evaluations; and
- Any other factors the POI and operator deem appropriate.

The overriding issue remains the quality and currency of the operator's check airmen. In their capacity as evaluators, check airmen are representatives of the Administrator and are an operator's first line of quality control. To arbitrarily establish a formula, in the name of standardization, that determines the quantity of check airmen without

consideration of their primary function would not enhance the overall quality of training or flight safety.

Second Issue -

Although the scheduling of training seems to be an instructor rather than a check airman issue, it's assumed the reference to training includes evaluation modules. The issue of how a center manages its employees is not an appropriate issue for the FAA to comment upon.

Question 2:

Regarding Notice 8000.294, Training Center Employees Records, no standards are set as to TCE training records that must be made available to the operators.

Response:

The following response assumes your question is referring to an operator who wishes to use the services of a center TCE as a company check airman. Notice 8000.294 is very clear concerning the procedures to be followed for the appointment of check airmen. More specifically, it also points to Order 8400.10 which details the records and reports that an operator must present to their POI when requesting the appointment of a check airman. If a center does not wish to have their TCEs act for or on behalf of an operator as a company check airman, then no record requirement exist for this purpose. If a center chooses to permit their TCEs to act as a check airman for an operator and to also take credit for a portion of their TCE training to meet the check airman training requirements of the operator, then the center is obliged to provide whatever documentation the operator requires to justify crediting the TCE's 142 training and qualification to be a check airmen. The documentation and training required to appoint an individual as a check airman has been outlined in FAA publications and available to the public for many years. FAA Notice 8000.294, Order 8400.10 and the certificate holder's operating regulation clearly outline the process and procedures for nominating an individual as a check airman. Operators must provide their POI with sufficient documentation to enable the POI to review the nominee's background, qualifications, and training in order for them to appoint an individual as a company check airman. Again, if no credit is being requested for the training that the TCE received from the center as part of his/her appointment as a TCE, then no records would be required by the operator since the operator would be completing all of the required training.

Question 3:

Regarding Notice 8000.294, Multiple Centers for the Same Aircraft Type, some Principle Operations Inspectors still believe that the Order required an operator to designate only one contract training provider in A0-31.

Response:

The information provided in 8000.294 remains current policy. The Notice attempted to caution POIs concerning the inherent difficulties and additional surveillance required when an operator request to have their training curriculum conducted by two different providers. If POI has reason to believe that multiple centers can provide the quality training required by the operator's approved curriculum they may authorize two or more facilities to conduct the subject training. However, if a POI suspects that an operator's curriculum cannot be adequately presented at multiple centers due to differing courseware, FTDs, simulators, etc. and or the operator may not have the ability to adequately monitor their training, the POI has the responsibility to limit such training. Operator and/or FAA surveillance workload may also play a role in the decision concerning multiple training locations.

Question 4:

Visa Requirements for foreign Part 142 Students – The FAA (Denver and Birmingham FSDOs) have approached certain Part 142 training centers concerning the issuance of I-20 to foreign pilots. What is the role of the FAA with regard to immigration status of foreign pilots at Part 142 training centers?

Response:

The FAA's role is not one of an immigrations officer. The FAA does not set or regulate the Government's policies or procedures relating to visa requirements. Our obligation extends only to verifying an individual's identity and the reporting of suspicious situations to local authorities. It is the center's responsibility to comply with applicable immigration and TSA requirements.

Question 5:

Two (2) Aircraft Type Limit for TCEs – Under what circumstances, could a TCE be authorized to evaluate in a third aircraft type?

Response:

This issue is currently being reviewed. Future policy and/or rule making will more clearly define make/model/series as it relates to aircraft manufactured by the same company. For example, although the Learjet family shares a common type rating across the family, the difference between the various series is significant. The Lear-25 and 55 may carry the same type rating; however, they are vastly different series.

Question 6:

Need for a Simulator PTS – Is there an FAA initiative to create a simulator PTS for ATP and type ratings?

Response:

This issue has been a point of discussion but currently we do not believe existing regulations support this suggestion. We are considering amending the PTS to provide for simulator-specific standards. We anticipate those standards to be associated with qualification modules within approved programs. Tasks which might be allowed to defer to an approved qualification module are:

1. Stalls. Type-specific stall scenarios, in operational conditions (high cruise with auto-throttle roll back, low speed maneuvering in a traffic pattern),
2. Approaches. FMS LNAV/VNAV approach operations in lieu of VOR, NDB, LOC, LOC B/C, etc., with one conventional non-precision using raw data as an “abnormal.”

Any comments you may wish to offer would be welcomed.

Question 7:

Use of IACRA at Part 142 Training Centers – certain modifications and improvements are required to make IACRA more user friendly for Part 142 use (flight time record for an additional aircraft type)

Response:

Please go to the website (<http://acra.faa.gov/iacra/>) and turn in your suggestion(s). You may also call 1-866-285-4942 and provide comments.

Question 8:

Progressive Type Ratings – See question # 6

Response:

Current rules do not permit progressive test or ratings. There are rule-making efforts underway that may impact this issue in the future.

Question 9:

Steep Turns and Stalls and the CRM Issue – not all Training Centers, TCPMs and Some Principle Operations Inspectors agree with the Part 142 guidance for these tasks. Need to re-visit.

Response:

The current policy concerning steep-turns and stalls and the participation of the PNF has been revisited on numerous occasions. The guidance contained in AFS-800's most recent response concerning this issue is appropriate. Future rule making may impact this issue; however, the position as stated accurately reflects AFS-250 position on the subject.

Question 10:

Need for Part 142 FAQ's

Response:

Agreed. Website has been modified to include a Q&A section.

Question 11:

Circling Approach Restrictions – 90 Degree Rule - Currently all simulator circling approach tasks must be performed at a visual database that will permit compliance with the 90 degree rule. This policy restricts the airports used for practical tests and proficiency checks to a limited number due to the visual capabilities of visual models used. If all checks are conducted at the same set of airports, training, testing and checking become too predictable, and the full training value of a simulator may be lost. What alternative could be proposed?

Response:

Please provide a suggestion.

Question 12:

142.65 – Use of Takeoff Reset – Need to discuss the restriction of the use of takeoff reset during testing and checking.

Response:

Take off reset may be used anytime the simulator is on the ground and the instructor or evaluator wishes to position the simulator for the next departure. The prohibition on using the simulators slew or reposting modes does not apply to setting the simulator up for second and subsequent departures during training or checking events.

Question 13:

Green Needle Non-Precision – Standard Policy?

Response:

See response to 19, below.

Question 14:

Land and Hold Short Training – Still required for ATP or Type Rating by FSGA – 99-02A?

Response:

Required to be trained but there is no requirement to accomplish the maneuver during a certification or proficiency evaluation.

Question 15:

(NDB.LDA, LORAN) listed in the ATP/Type Rating PTS are not available for sim software because approaches are becoming or are obsolete. Training centers may want to consider deleting these approaches from core training programs. (PAIFI)

Response:

There are a number of NDB approaches in the software of many simulator operators. There are many GPS approach overlays for a number of GPS approaches.

Question 16:

Need for standards for Instructor Standardization Training for 121 carriers not to exceed the 16 hour base. (Basic Indoc???) (PAIFA)

Response:

Hourly limits or mandatory hours for such training miss the objective. Notice 8000.294 discussed required training to qualify a center's flight instructor to train an air carrier curriculum. AFS-250 has developed a job aid for operators and POIs to use when evaluating the amount of training a centers instructor must complete to meet the minimum requirements of the appropriate operating rule.

Question 17:

Home Study Credits – Need clarification for Part 61 application. The only guidance is for air carrier training programs.

Response:

Please provide a little more information to explain the question. The only comment that I might make at this point is that home study can be used to meet certain Part 61 ground training requirements, while other requirements cannot use home study; please specify which requirements are considered in the question.

Question 18:

Oral Exams – Crew / Individual – Some training centers have received TCPM guidance that requires that separate oral exams be conducted even though two applicants have trained together as a crew, and are being tested as a crew for the type rating. Handbook guidance does permit this.

Response:

The objective of an oral evaluation is to determine an individual's knowledge, not the knowledge of the crew. The fact that individuals are being trained and flight-tested as a crew is really not pertinent to the issue. The demonstration of knowledge pertaining to the certificate being sought is not a crew event. Additionally, it is the responsibility of the evaluator to determine that the "individual" has the knowledge required to support the skills necessary to satisfactorily complete the flight portion of the subject evaluation.

Question 19:

The following guidance was received by a TCPM. Is this standard guidance to all training centers?

"Area of Operation V: Instrument Approaches; Task D: Non-precision Approaches, states in part "The choices must utilize two different systems; i.e., NDB and one of the following: VOR, LOC, LDA, GPS, or LORAN."

Surveillance conducted during checking and testing has shown that clients are actually performing both approaches through retrieval from the Control Display Unit (CDU/FMS). If the flight simulator has a properly installed GPS, the applicant must demonstrate GPS approach proficiency during one approach. However, the second non-precision approach must be selected manually by tuning the appropriate navigation receiver, so called "green needle " (i.e. Gulfstream IV), as the primary source of navigation, not the FMS, and the aircraft operated according the current published approach chart for that non-precision approach. The FMS may be set to the co-pilot side if desired for use during a missed approach."

Response:

The information provided is insufficient to enable us to respond to your question. However, one comment concerning the statement about GPS proficiency may be in order. Specifically the sentence "If the flight simulator has a properly installed GPS, the applicant must demonstrate GPS approach proficiency during one approach" was refuted and has been eliminated from the current revision to the PTS. During a 2004 telcon among various TCPMs, training center representatives, and the 142 national resource specialists, the determination was made that an operator's aircraft equipage would determine whether or not GPS approach proficiency would be required. The fact that a simulator may have an operable GPS installed was not the controlling factor. The current revision to the PTS guide reflects this point and the old language requiring an individual to demonstrate GPS approach proficiency during one approach just because the simulator was so equipped has been removed.